

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10080-NMG
)	
I-HSIN "JOEY" CHEN,)	
)	
Defendant)	

MOTION FOR RULE 11 HEARING

The government respectfully moves for a hearing pursuant to Federal Rule of Criminal Procedure 11. As grounds for this motion, the government states that the defendant, I-Hsin "Joey" Chen, has indicated, through his counsel, that he wishes to plead guilty to Count Five of the Fourth Superseding Indictment.

The government understands that defendant and his counsel are located in California. The government has not objection to a request that the hearing be conducted by video.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Kristen A. Kearney
KRISTEN A. KEARNEY
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Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: December 9, 2021

/s/ Kristen A. Kearney
KRISTEN A. KEARNEY